
EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

**CELLULAR COMMUNICATIONS
EQUIPMENT LLC,**

Plaintiff,

v.

HTC CORPORATION, ET AL.,

Defendants.

**Case No. 6:16-cv-0363-KNM
(Lead Case)**

JURY TRIAL DEMANDED

EXHIBIT A

PLAINTIFF'S CLAIM CONSTRUCTION CHART

U.S. Patent No. 7,218,923

	Claim Term	Plaintiff's Position and Supporting Evidence	Defendants' Proposed Construction
1.	"diverting unit" (claim 24)	<p><u>Proposed Construction</u></p> <p>Plain and ordinary meaning.</p> <p>No construction necessary.</p> <p>Alternatively:</p> <p>"a component or components that can divert messages intended for the communications network"</p> <p><u>Supporting Evidence:</u></p> <p>'8,923 patent: Abstract; 1:59-2:11; 2:13-52; 2:59-67; 3:11-13; 3:56-67; 4:1-10; 4:20-5:4; 6:37-48; 9:10-12:50.</p> <p>Response to Office Action dated June 2, 2006: pp. 15-16.</p>	<p>"a component with a separate structure than that of the controlling entity, which is configured to divert a message of the messages sent from the application program and destined for the communication network to a controlling entity residing in the terminal . . ."</p>

		<p><i>Samsung Electronics Co., LTD, et al. v. Cellular Communications Equipment, LLC</i>, IPR2015-01927, Paper 8 (PTAB Mar. 15, 2016): pp. 3; 5-7; 16-17.</p> <p><i>HTC Corporation, et al. v. Cellular Communications Equipment, LLC</i>, IPR2014-01133, Paper 48 (PTAB Jan. 4, 2016): pp. 3-4; 7-13.</p> <p>Any additional evidence relied on by Defendants.</p>	
2.	<p>“controlling entity” (claims 24, 26)</p>	<p><u>Proposed Construction</u></p> <p>Plain and ordinary meaning.</p> <p>No construction necessary.</p> <p>Alternatively:</p> <p>“a component that can control the rights and behavior of applications”</p> <p><u>Supporting Evidence:</u></p> <p>’8,923 patent: Abstract; 1:59-2:11; 2:13-52; 2:59-67; 3:11-13; 3:56-67; 4:1-10; 4:20-5:4; 6:37-48; 9:10-12:50.</p> <p>Response to Office Action dated June 2, 2006: pp. 15-16.</p> <p><i>Samsung Electronics Co., LTD, et al. v. Cellular Communications Equipment, LLC</i>, IPR2015-01927, Paper 8 (PTAB Mar. 15, 2016): pp. 3; 5-7; 16-17.</p> <p><i>HTC Corporation, et al. v. Cellular Communications Equipment, LLC</i>, IPR2014-01133, Paper 48 (PTAB Jan. 4, 2016): pp. 3-4; 7-13.</p> <p>Any additional evidence relied on by Defendants.</p>	<p>“a component with a separate structure than that of the diverting unit, which is configured to control, based on the message and before the message is transmitted to the communication network, whether the application program behaves in a predetermined manner in the communication terminal . . .”</p>